

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MINHYE PARK, :
:
Plaintiff, : 20-CV-2636 (PKC) (LB)
:
August 11, 2021
:
V. : Brooklyn, New York
:
DAVID DENNIS KIM, :
:
Defendant. :
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TRANSCRIPT OF CIVIL CAUSE FOR STATUS CONFERENCE
BEFORE THE HONORABLE LOIS BLOOM
UNITED STATES MAGISTRATE JUDGE

APPEARANCES:

For the Plaintiff: JAE SOOG LEE, ESQ.
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transcript produced by transcription service

1 THE CLERK: Civil cause for telephone status
2 conference, docket number 20-CV-2636, Park v. Kim.

3 Will the parties please state your names for
4 the record.

5 MS. LEE: J.S. Lee from JSL Law Offices for
6 plaintiff.

7 MS. NEWMAN: Hayley Newman from Heidell,
8 Pittoni, Murphy & Bach for defendant Dr. Kim.

9 THE CLERK: The Honorable Lois Bloom
10 presiding.

11 THE COURT: Good morning, Ms. Lee and Ms.
12 Newman. This is a telephone conference in plaintiff's
13 medical malpractice case, in which he alleges that
14 defendant, who is a doctor, committed malpractice by
15 failing to remove her fetus during a medical procedure.
16 I last spoke to the parties on December 22nd, 2020 and
17 at that time, I ordered the parties to complete all
18 discovery by June 15th and that any party seeking to
19 file a dispositive motion should request a pre-motion
20 conference by June 29th.

21 On June 2nd, I granted the parties an
22 extension of time to complete all discovery by
23 September 30th and that any request for a pre-motion
24 conference should be made to Judge Chen in accordance
25 with her rules by October 15th. After I granted that

1 extension request, on July 16th, I received a motion to
2 compel, and the motion to compel is by defendants to
3 compel plaintiff to produce documents and responses.
4 I've now received plaintiff's objections to that, and I
5 have to say this case is a mess. I really don't
6 understand what is going on here.

7 Ms. Lee, has there been any progress on
8 discovery since the motion to compel was filed?

9 MS. LEE: Yes, your Honor. For plaintiff
10 (ui) all authorizations on February 9th, 2021, and
11 defendant asked again so we provided twice. Now,
12 defendant asks the plaintiff to provide the insurance
13 records of her whole life but we already --

14 THE COURT: Ms. Lee, did you hear what my
15 question was? My question was, since the motion was
16 filed, has there been any progress. I did not ask you
17 what happened before they filed the motion to compel,
18 I'm asking since they filed it, has there been any
19 progress?

20 MS. LEE: Your Honor, because the plaintiff
21 did whatever defendant asked, so at this moment, I
22 don't believe we need to provide more. That's the
23 plaintiff's position, your Honor.

24 THE COURT: So, Ms. Newman, has there been
25 any progress on discovery since filing the motion to

1 compel?

2 MS. NEWMAN: None.

3 THE COURT: They're saying they filed --
4 that they gave you authorizations back in February.

5 MS. NEWMAN: Correct.

6 THE COURT: What is going on with the
7 documents that you're trying to get from plaintiff's
8 counsel?

9 MS. NEWMAN: Well, unfortunately, the
10 providers are all located in South Korea, and our firm
11 generally works with third parties that exclusively
12 process authorizations on our behalf to try to get
13 these records. And the third party advised my
14 paralegal that no one is returning their calls
15 specifically at the collateral source provider in South
16 Korea. I then had my own paralegal try to reach out to
17 them and she was unsuccessful, too. We just don't know
18 how to obtain these records beyond sending letters and
19 making phone calls, and those efforts have been ongoing
20 for over a year and have been unproductive,
21 unfortunately. I don't --

22 THE COURT: Let me be straight with you, Ms.
23 Lee. How are you going to prove that this medical
24 procedure did not remove the fetus if you don't get the
25 medical records from Korea for your client?

1 MS. LEE: Yes, your Honor. We have already
2 proved by defendant's medical records December 13th,
3 2017. Defendant clearly noted the fetus that present
4 alive (sic). Then also, after that --

5 THE COURT: Ms. Lee, Ms. Lee.

6 MS. LEE: Yes.

7 THE COURT: You are objecting to getting any
8 of the medical records from Korea.

9 MS. LEE: No, your Honor.

10 THE COURT: You have to prove that the
11 doctor here failed to remove the fetus as expected.

12 MS. LEE: Yes, your Honor. So we prove and
13 provided the two (ui) in South Korea. They are
14 medical --

15 THE COURT: The two what? I can't --

16 MS. LEE: Two physicians, their medical
17 records. We provided all medical records to the
18 defendant. Those medical records revealed the fetus
19 was alive after the surgery. So we have three medical
20 -- three doctors to prove the fetus was alive after
21 surgery.

22 THE COURT: Again, I'm looking at the
23 records that were attached to document 19. Is that
24 what you're thinking proves that your client --

25 MS. LEE: Your Honor, the plaintiff filed

1 the letter motion that all documentation provided
2 there. That is all medical records of defendant Dr.
3 Kim and two doctors from South Korea, which is (ui).
4 We (ui) medical documents (ui).

5 THE COURT: Ms. Newman?

6 MS. NEWMAN: Yes, your Honor. She did
7 produce records from these two providers. This was
8 discussed back at the conference in December because
9 the records should produced did not include an actual
10 procedure note of a second abortion. This is something
11 we talked about at the last conference, you know.
12 We're not contesting that she didn't produce these
13 records, we're just saying that we need more. First of
14 all, there's an informed consent issue, which is why we
15 wanted the collateral source records in part, because
16 this patient had two prior abortions and her knowledge
17 of the procedure before the abortion with Dr. Kim is
18 obviously relevant to what she knew going into the
19 procedure.

20 Also, what types of abortions were performed
21 before Dr. Kim is medical relevant, and our expert has
22 asked us to try and get those records as part of her
23 review. I don't even know what authorizations to
24 demand because we don't know where those procedures
25 were performed or who performed them.

1 MS. LEE: Your Honor, if defendants now are
2 asking to provide a (ui) insurance record of
3 plaintiff's whole life. (Ui) two abortions --

4 THE COURT: Again, Ms. Lee.

5 MS. LEE: Yes.

6 THE COURT: Your client is the one bringing
7 the case.

8 MS. LEE: Yes.

9 THE COURT: Your client has had two prior
10 procedures that may have bearing on what happened in
11 this case.

12 MS. LEE: Your Honor --

13 THE COURT: So talking about -- excuse me.
14 Do not talk over me.

15 MS. LEE: Yes.

16 THE COURT: Talking about that you've given
17 her everything, you have not given her everything. You
18 have not given her the records that she did talk to the
19 Court about back in December. And in December, we
20 talked about needing those records and if you're not
21 going to help provide those records, then again, your
22 client is going to have a problem maintaining this
23 malpractice case.

24 In December, December 22nd, I held a
25 conference. Defense counsel stated they had only

1 gotten some of the records and they had outlined what
2 has still to be provided. Plaintiff says they
3 responded to everything, and I ruled that defendant was
4 entitled to get those medical records and that the
5 prior abortion was something that they were able to
6 discover records about. Again, the documents regarding
7 the second abortion that your client is saying she was
8 caused to suffer in Korea, she needs to get those
9 records. There is nothing in the records that have
10 already been produced that says that she had an
11 abortion in Korea, and it's not acceptable -- I said
12 this to you before -- to say that your client doesn't
13 want to turn over the records. This is her case and if
14 she's not going to turn over these records, then you're
15 not going to be able to prove a malpractice claim
16 against this doctor in this Court.

17 MS. LEE: Your Honor, may I interrupt you?

18 THE COURT: What do you want to say?

19 MS. LEE: The second abortion was, after Dr.
20 Kim failed to remove the fetus, then plaintiff went to
21 South Korea and she got second abortion. That record
22 plaintiff provided to defendant. Even after that,
23 defense counsel asked everything. So we provided again
24 the ultrasound DVD, we provided everything.

25 THE COURT: Again, Ms. Lee, you did not

1 provide everything. Saying that you provided
2 everything -- again, that you provided an ultrasound
3 but they asked specifically --

4 Ms. Newman, what is the name of the
5 procedure sheet that you needed?

6 MS. NEWMAN: It would be an operative report
7 or a procedure report that describes the technique and
8 what was done, whether it was a dilation and curettage,
9 a dilation and evacuation, the steps to prepare the
10 patient, what tools or instruments were used, the
11 outcome of the procedure. There might be anesthesia
12 notes because generally, this procedure is performed
13 under anesthesia. So I'm really looking for the
14 equivalent of an operative report and any other medical
15 records that were maintained at that time by the
16 anesthesiologist.

17 THE COURT: Ms. Newman --

18 MS. LEE: Your Honor --

19 THE COURT: Excuse me, Ms. Lee.

20 MS. LEE: Yes.

21 THE COURT: Ms. Lee is saying that she gave
22 you the ultrasound. Can you place on the record what
23 she has given you and why that is or is not what you've
24 been asking for?

25 MS. NEWMAN: She gave us a copy of records

1 from two subsequent providers in Korea. There are
2 pictures, ultrasound pictures included in those
3 records. There is no note or second procedure note of
4 a second abortion, which was discussed in December.
5 Then after that conference, at some point in time, I
6 received a one-page piece of paper in Korean, which I
7 then paid to have a Korean translator, a certified
8 Korean translator translate into English, an unsigned
9 document that says that name of the patient and that a
10 dilation and curettage was performed. It's like a one-
11 sentence piece of paper that could have honestly been
12 written by anyone. It's not an operative report, it's
13 not a medical record.

14 MS. LEE: Your Honor, we (ui) the doctor as
15 well to doctors in South Korea. Whatever they have is
16 all records, anything they provided to us, and we
17 forwarded it to defendant. I want to make sure. So
18 now the defendant want to have all medical records
19 after Dr. Kim's failure or ten years before the
20 plaintiff's abortion. (Ui) 15 years, when she was a
21 teenager. That is the only one. If the defendant
22 asking the plaintiff's abortion for teenager from now
23 for 15 years ago, the plaintiff even did not remember
24 the place or the name of the clinic because at the
25 time, her boyfriend brought her to a clinic. Nobody

1 knows -- she cannot remember right now, then how could
2 (sic)? The second thing is, if Dr. Kim -- the prior
3 abortion ten years ago, it is important and necessary
4 to her abortion surgery, Dr. Kim should ask her before
5 surgery. When was it, where was it?

6 THE COURT: Ms. Lee, Ms. Lee, Ms. Lee.

7 MS. LEE: Yes.

8 THE COURT: Your argument that if it was
9 important for Dr. Park to know about prior abortions,
10 he should have asked before he performed this
11 procedure, that is not a winning argument when you're
12 bringing a federal malpractice lawsuit, okay?

13 MS. LEE: Your Honor, the doctor said --

14 THE COURT: Ms. Lee, Ms. Lee.

15 MS. LEE: Yes.

16 THE COURT: If you keep interrupting me, I
17 am going to not accept you to appear by phone. It is
18 not okay to keep interrupting me. Do you understand?

19 MS. LEE: Yes.

20 THE COURT: So your client has decided to
21 bring this lawsuit. I understand that you are saying
22 she doesn't remember the name of the prior abortion
23 provider, so we can't get those records, which I
24 imagine is why defendant's counsel is asking for the
25 insurance records, because perhaps those insurance

1 records would show who the prior doctors were.

2 Is that the reason why you're asking for the
3 collateral source information from her insurer, Ms.
4 Newman?

5 MS. NEWMAN: Correct.

6 THE COURT: So, Ms. Lee, when you bring a
7 medical case against a doctor, yes, there are many
8 questions that are going to be asked of the plaintiff.
9 And that the plaintiff lives in Korea does not change
10 what the questions that need to be answered are. So if
11 she's not able to remember who gave her these prior
12 procedures, they should be able to get information from
13 her insurer.

14 It doesn't mean, Ms. Newman, that that will
15 necessarily be reflected there, and I would like to
16 limit the temporal scope of what you're asking for.

17 MS. NEWMAN: Okay, I understand that.

18 MS. LEE: Your Honor?

19 MS. NEWMAN: I can make a diligent effort.

20 She explained the reasoning as to why she doesn't
21 remember the name and location of one of the two
22 abortions but Dr. Kim's records indicate she reported
23 she had two. I don't know when the other one happened.
24 Two prior.

25 MS. LEE: Your Honor, if I may interrupt

1 here. Defense counsel keeps saying two abortions,
2 prior two abortions. No, that's not correct. It's
3 only one, and defense counsel asked -- demanded her
4 medical records. That is a violation of plaintiff's
5 privacy.

6 THE COURT: No, it is not. It is not. Ms.
7 Lee, that argument is a losing argument. Your client
8 is bringing this lawsuit. So to the extent that she
9 has chosen to bring this lawsuit, it is a losing
10 argument for her to claim that it's a violation of her
11 privacy. She is suing a doctor, saying the doctor
12 committed malpractice. She must turn over these
13 records. If she does not want to turn over these
14 records, then she should not bring the lawsuit.

15 MS. LEE: Your Honor, as we said, she
16 provided all medical records, everything.

17 THE COURT: No, she did not. She did not.

18 MS. LEE: Your Honor, the only --

19 THE COURT: She did not provide all the
20 medical records. There are ultrasound records provided
21 but there is no operative report talking about the
22 procedure.

23 MS. LEE: That does not have -- the
24 plaintiff has not had that. Whatever the doctor
25 provided -- the plaintiff provided authorization to

1 defendant. Then the defendant can get it.

2 THE COURT: Let me raise another issue. Let
3 me raise another issue. There are three open motions.
4 There's the motion to compel and there is also your
5 request, Ms. Lee, for a settlement conference.

6 MS. LEE: Yes.

7 THE COURT: Have you tried to talk to Ms.
8 Newman about settling the case?

9 MS. LEE: Yes. We sent the settlement
10 demand on 2/20/2021. However, defense counsel has
11 never responded to that settlement demand at all.

12 THE COURT: Ms. Newman?

13 MS. LEE: Then after that --

14 THE COURT: Ms. Newman?

15 MS. NEWMAN: That's untrue, your Honor. I
16 have an email responding to her settlement demand,
17 which by the way never included an amount, just a
18 demand that we attend a settlement conference, to which
19 the response was, we still need this discovery from
20 you. We need clarification of the interrogatory
21 responses, the medical records, we need to corroborate
22 all of the claims and damages alleged in the complaint.
23 I mean, we are focusing on the most important records
24 here, which are the subsequent abortion records and the
25 prior records.

1 Overall, she's claiming that she had other
2 injuries, which there's no proof of. I've received
3 nothing to show that she had ongoing complaints of pain
4 and bleeding or that she suffered lost earnings, which
5 are claimed in the case. So yes, I did respond to that
6 email and said, we don't have the discovery we need to
7 even talk about that at this point in time.

8 THE COURT: Let me say, Ms. Lee, you are not
9 helping your client because, again, the defendants made
10 the issue known to me back in December. Again, they're
11 making the issue known to me now. They're saying that
12 you did not adequately respond to the interrogatories
13 or to the demand for production of documents. So I
14 have to say to you I don't understand what it is you
15 think is going to happen here but, Ms. Lee, I'm
16 granting the defendant's motion to compel the
17 discovery.

18 I'm going to give you a chance -- because I
19 do accept that certain of these records from Korea may
20 not be known to plaintiff. I accept that if she had an
21 abortion many years ago, she may not know the
22 providers. That being said, if there is information
23 from her insurer, she must turn that over. Ms. Lee --

24 MS. LEE: Yes, your Honor.

25 THE COURT: The Court is ordering you to

1 turn over that information, and I will limit it so that
2 it's not for her entire life. But she says that these
3 events happened in 2017, so I'll say that it has to go
4 back to 2010. 2010.

5 MS. LEE: Yes.

6 THE COURT: So she must turn over the
7 information about her insurer, and the defendants can
8 try to get the information from the insurer. Also, if
9 there is a claim for lost earnings, she must support
10 those claims. And last, it says that plaintiff has not
11 provided any experts. In a malpractice case, you need
12 expert discovery. There is no way that you could prove
13 malpractice unless you have an expert.

14 So I am going to give you until the deadline
15 that has been extended to turn over these things. So
16 you have now until September 30th to turn over any lost
17 earnings, so any records that support claims for lost
18 earnings, who your expert is going to be and any expert
19 report, and any collateral source information going
20 back to 2010. So that request for a motion to compel
21 is granted, and your motion for a settlement conference
22 is denied without prejudice. You need to speak to Ms.
23 Newman about precise numbers, about what your client's
24 claims are. She cannot have a settlement conference
25 without there being demands that have been talked

1 about. I'm not going to schedule a conference unless
2 you and Ms. Newman start talking between your clients
3 and yourselves.

4 MS. LEE: Your Honor, I want to ask
5 defendant, why didn't you respond to plaintiff's demand
6 for admissions and interrogatories? Your Honor --

7 THE COURT: Again, I am not orally accepting
8 a motion at this time. Ms. Lee, it is not proper in a
9 case where you were able to respond and you did not say
10 anything in your response regarding missing discovery.
11 Again, I am not going to accept that you are raising
12 that now. I'm telling you that you have -- and this
13 all has to be done -- so September 30th is the deadline
14 to complete all discovery so I'll give you thirty days
15 from today to get everything that I've discussed with
16 you.

17 So by September 10th, 9/10/21, plaintiff must
18 produce the information that the Court has specified,
19 anything to support her claim for lost earnings,
20 anything regarding expert discovery, and her
21 authorization regarding collateral source information
22 from her insurers with the names of the insurers, all
23 of that by September 10th. And I am warning you that
24 your client can be subject to sanctions, which could be
25 as severe as dismissal of the case, if she fails to

1 comply.

2 MS. LEE: I understand, your Honor. Your
3 Honor, plaintiff provided all authorizations. Then
4 what else should plaintiff provide, copies of the
5 medical records? That's defendant's responsibility,
6 not us. Plaintiff only provides authorizations,
7 including insurance records.

8 THE COURT: Ms. Lee, Ms. Lee.

9 MS. LEE: Yes.

10 THE COURT: You're making the same argument
11 that you've already made. They have said that they
12 never got an operative report for the abortion that
13 you're saying she was required to have because Dr. Kim
14 did not properly perform the abortion. They say they
15 got a one-page sheet that could have been written by
16 anybody, in Korean, that it was not an operative
17 report.

18 Did it have any letterhead or name of a
19 physician on it, Ms. Newman?

20 MS. NEWMAN: I can't honestly speak to
21 whether or not there was letterhead or the name of a
22 physician because the version I received from the
23 translator just has different boxes of medical
24 categories, most of which are left blank. I honestly
25 don't know because I don't know if that would have been

1 translated, if they translate letterhead or not. I
2 don't know.

3 THE COURT: Well, you're going to need to
4 confer with Ms. Lee on that.

5 MS. NEWMAN: Okay.

6 THE COURT: Again, Ms. Newman, I've granted
7 your motion to compel. I've given them until September
8 10th. The deadline for discovery has already been
9 extended to September 30th. Have you conducted a
10 deposition of the plaintiff?

11 MS. NEWMAN: No, your Honor, because I was
12 hoping to have these records before deposing her.

13 THE COURT: But it looks like that might not
14 be possible, so you need to move forward if you're
15 going to plan to depose plaintiff.

16 MS. NEWMAN: Okay.

17 THE COURT: Because getting records from an
18 insurer in Korea by September seems somewhat unlikely,
19 but you can certainly ask the questions that you need
20 to ask. If she doesn't remember things that go back
21 ten years, that might be reasonable, but if she doesn't
22 remember things that happened around the time that
23 she's saying that Dr. Kim failed to live up to his
24 obligations, that's something that would be relevant in
25 any transcript.

1 MS. NEWMAN: Okay.

2 THE COURT: That's the same for you, Ms.
3 Lee. If you're intending to depose Dr. Kim, you'd
4 better get that scheduled.

5 MS. LEE: Yes, your Honor. Should the
6 plaintiff send a letter motion to compel defendants?

7 THE COURT: No, absolutely not.

8 MS. LEE: Your Honor --

9 THE COURT: Again, Ms. Lee, you seem to
10 think that this is your time to complain about what
11 defendants have failed to do, and yet I had conferences
12 with you going back to December. That was their
13 conference to say that they didn't get what they
14 needed. I already extended the deadline for the
15 parties to complete discovery. Still, you never said
16 anything about what you didn't get. So no, now is your
17 time to schedule the deposition. If you intend to
18 depose Dr. Kim, now is the time to schedule that with
19 Ms. Newman. Do you understand me?

20 MS. LEE: Yes, your Honor. We demanded the
21 admissions and interrogatories back February 9, 2021.
22 But defense counsel --

23 THE COURT: Ms. Lee, Ms. Lee, did you hear
24 what I said, that if you plan to depose the doctor who
25 is the defendant, you need to arrange for that now. It

1 should be conducted remotely. Same thing for your
2 client who is in Korea, it should be done remotely.
3 And you need to make that arrangement so you complete
4 those depositions by September 30th. Do you understand
5 me, Ms. Lee?

6 MS. LEE: Yes, your Honor. Then one
7 question, your Honor. Can we depose the defendant
8 first?

9 THE COURT: There is no firstness in federal
10 court. I am not going to govern who deposes who first.
11 I am going to tell you, Ms. Lee, that you need to make
12 this case move. I am not going to extend discovery and
13 your client must make herself available for deposition
14 by defendant's counsel in advance of the deadline. Do
15 you understand?

16 MS. LEE: Yes, your Honor.

17 THE COURT: Okay.

18 MS. NEWMAN: I do believe we did talk about
19 priority, though, when the case was filed. I
20 understand that that doesn't exist in federal court but
21 I'm already agreeing to take a deposition with very
22 limited records. I do think I'm entitled to take a
23 deposition of her client, who has produced very little
24 documentary evidence in support of the claims, before
25 my client, who has patiently waited for the resolution

1 of this case since it was filed.

2 THE COURT: Ms. Newman, get your notice to
3 Ms. Lee. Again, I don't expect to hear again from the
4 parties saying that they can't get this scheduled.

5 It is something difficult because one person
6 is in Korea, but I am not letting you hold this up, Ms.
7 Lee. They have the right to depose your client. Even
8 without all the records, that should be something that
9 happens. That way, we can at least lock her into
10 whatever the claim is about. If you don't produce lost
11 earnings records, then there's not going to be any
12 claim for lost earnings. Do you understand me, Ms.
13 Lee?

14 MS. LEE: Yes, your Honor. However, the New
15 York Workers Compensation Act -- in that case, they
16 applied the minimum --

17 THE COURT: I'm sorry, Ms. Lee. Workers
18 compensation won't apply for this case.

19 MS. LEE: The minimum rate would apply.

20 THE COURT: Ms. Lee, Ms. Lee, workers
21 compensation won't apply to this case. If you don't
22 produce records or lost earnings and there's no
23 testimony that supports that she was employed and lost
24 earnings because of Dr. Kim, you will not be able to
25 rely on workers comp. Do you understand me?

1 MS. LEE: Then what -- I understand, your
2 Honor. However, then the plaintiff can submit her
3 affidavit saying she wasn't able to work due to the
4 failure of the abortion.

5 THE COURT: Let her turn over records and
6 let her testimony say where she worked and how much she
7 earned and how long she was out of work because of
8 this. If there isn't documents or testimony to support
9 it, there is no lost earning claim.

10 Anything else that needs to be addressed,
11 Ms. Lee? I've granted defendant's motion to compel.
12 I've given you until September 10th to turn over the
13 records. They will be specified in my order. Is there
14 anything else that needs to be addressed?

15 Hearing nothing, is there anything else, Ms.
16 Newman, that needs to be addressed?

17 MS. NEWMAN: No, thank you. I thought your
18 question was to Ms. Lee.

19 THE COURT: I did but she didn't answer my
20 question.

21 MS. NEWMAN: Nothing on our end, your Honor,
22 thank you.

23 THE COURT: Ms. Lee, last chance. Anything
24 else you want to raise before we get off the line?

25 MS. LEE: Yes, your Honor, just to specify

1 -- specify up to 2010, then it's abortion records only.

2 THE COURT: No, it was the insurance records
3 to 2010.

4 MS. LEE: Yes, insurance records. Your
5 Honor, that means plaintiff provides authorization or
6 (ui) the insurance record?

7 THE COURT: Again, if she has insurance
8 records going back to 2010, she should produce them.

9 MS. LEE: She doesn't have it. That's why
10 she provided --

11 THE COURT: Then she has to sign an
12 authorization for her insurance records to be given to
13 Ms. Newman.

14 MS. LEE: Yes, she did.

15 THE COURT: Ms. Lee, I don't think you're
16 understanding the Court. I really don't think you're
17 understanding because --

18 MS. LEE: Your Honor --

19 THE COURT: -- your client brought this case
20 and you just keep repeating that she's given
21 everything.

22 MS. LEE: No, your Honor --

23 THE COURT: I am granting their motion to
24 compel, which will require you to turn over records and
25 respond to their interrogatories by September 10th. You

1 should complete all depositions in this case by
2 September 30th.

3 With that, we are adjourned. Thank you.

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18 I certify that the foregoing is a correct
19 transcript from the electronic sound recording of the
20 proceedings in the above-entitled matter.
21

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25 ELIZABETH BARRON

August 20, 2021